

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

Case No. 1:25-cv-04794

ROCKEFELLER PHOTOS, LLC,

Plaintiff,

v.

JULIE'S ELMWOOD PARK LLC d/b/a THE
SPORTZ NOOK, JULLITE HARB, and
MARC PACIONE,

Defendants.

**MOTION FOR CLERK'S DEFAULT AS TO DEFENDANT JULIE'S ELMWOOD
PARK LLC d/b/a THE SPORTZ NOOK**

Plaintiff Rockefeller Photos, LLC ("Plaintiff"), by and through undersigned counsel and pursuant to Fed. R. Civ. P. 55, hereby moves for entry of a default by the Clerk against defendant Julie's Elmwood Park LLC d/b/a The Sportz Nook ("The Sportz Nook"), and in support thereof states as follows:

1. On May 1, 2025, Plaintiff filed its Complaint in this action. See D.E. 1.
2. On May 31, 2025, The Sportz Nook was served with a copy of the Summons and Complaint in this action. See D.E. 7.
3. On June 16, 2025, Plaintiff filed its First Amended Complaint in this action. See D.E. 9.
4. Pursuant to Fed. R. Civ. P. 15(a)(3), The Sportz Nook's response/answer to the First Amended Complaint was due on or before June 30, 2025.
5. As the docket in this action reveals, The Sportz Nook has failed to file any Answer

or otherwise respond to the First Amended Complaint as required by the Court.

6. Attached to this Motion as Exhibit “A” is a proposed default for entry by the Clerk.

WHEREFORE, Plaintiff respectfully requests that the Clerk enter a default against Julie’s Elmwood Park LLC d/b/a The Sportz Nook and for such other and further relief as the Court deems proper under the circumstances.

Dated: July 9, 2025.

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By: /s/ Christine Zaffarano
Christine Zaffarano, Esq.
Daniel DeSouza, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on July 9, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will electronically serve all counsel of record.

/s/ Christine Zaffarano
Christine Zaffarano, Esq.